

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)

Revision of the Commission's Rules)
To Ensure Compatibility with Enhanced)
E911 Emergency Calling Systems)

CC Docket. No. 94-102 /
DA 00-1091

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF PVT NETWORKS, INC. AND GW WIRELESS, INC.

PVT Networks, Inc. ("PVT") and GW Wireless, Inc. ("GWI"), by their attorneys, hereby replies to the comments filed regarding a new implementation deadline for TTY access to digital wireless systems for 911 calls.¹ PVT is a broadband PCS, LMDS and 39 GHz licensee that provides service to rural communities in southeastern New Mexico and is wholly-owned subsidiary of the Peñasco Valley Telephone Cooperative ("PVTC"). GWI is a broadband PCS and LMDS licensee that provides service to rural communities in southwestern South Dakota and is a wholly-owned subsidiary of the Golden West Telecommunications Cooperative, Inc. ("GWTC").

In its *Public Notice*, the Commission announced that Lucent Technologies ("Lucent") has presented a "potential" solution for the TTY/digital problem and that Ericsson, Inc. ("Ericsson") has "proposed a potential solution" for the TTY digital problem for GSM networks. Based on these announcements, the Commission has proposed a deadline of December 31, 2001 for all carriers to be capable of providing TTY access to digital wireless systems for 911 calls.

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¹ See Public Notice, *Wireless Telecommunications Bureau Seeks Comments on New Implementation Deadline For TTY Access To Digital Wireless Systems for 911 Calls*, DA 00-1091 (rel. May 17, 2000) ("Public Notice").

First and foremost, PVT and GWI assure the Commission and the deaf/hearing impaired community that each are committed to making their digital wireless networks accessible to individuals who use TTY devices. However, as commentators have noted, carriers cannot implement solutions to the TTY compatibility problem until the necessary software and hardware upgrades have been designed, tested and manufactured in sufficient quantities by *all* equipment manufacturers. Because carriers are dependent upon their equipment vendors to make these upgrades available, and not all vendors have developed and tested their TTY upgrades, it is premature for the FCC to impose any implementation deadline upon carriers.

As a number of manufacturers pointed out in their comments, the “potential solutions” the FCC has cited to have not yet been field-tested.² Even Ericsson, the creator of one of the potential solutions, believes that it will not be able to provide the necessary equipment early enough for carriers to meet a December 31, 2001 deadline.³ After the technology is developed and tested, carriers must be given sufficient time to install and test the new software and equipment on their own systems.⁴ PVT and GWI would not be opposed to a deadline that is based upon a date when *all* equipment vendors have developed and tested their TTY upgrades, and can make these upgrades available to all of their customers. The deadline should also provide carriers with a reasonable amount of time to install and test the TTY upgrade package, and to train their technical and sales staff on the maintenance and use of these enhanced capabilities. In this regard,

² Comments of Nokia Inc. (“Nokia Comments”) at 2-3; Comments of Motorola, Inc. (“Motorola Comments”) at 3.

³ Comments of Ericsson, Inc. (“Ericsson Comments”) at 4. Ericsson believes that “it is imperative that the Commission provide service providers with sufficient time to accomplish the rollout and launch of equipment. This should be a date subsequent to the tentative December 31, 2001 deadline.” *Id.*

⁴ Comments of Sprint PCS (“Sprint PCS Comments”) at 5-6.

PVT and GWI support a proposal by BellSouth that would give carriers 12 months to implement a TTY solution after their particular infrastructure manufacturer has successfully completed its testing and reported such progress to the TTY Forum.⁵ The TTY Forum can then notify the Wireless Telecommunications Bureau (“Bureau”) that a solution is available, and the Bureau can issue an appropriate notice to the industry.

Finally, PVT and GWI believe it is unnecessary for the Commission to impose new (and burdensome) reporting requirements upon individual carriers when it can best monitor the progress of digital TTY deployment through consultation with the industry as a whole through the TTY Forum. Until a solution is available, any reporting requirement would be meaningless. Once a particular equipment manufacturer has completed testing of its digital TTY solution, and notified the TTY Forum of its availability, the FCC can impose an implementation reporting requirement on carriers using that manufacturer’s equipment through its public notice announcing the availability of the solution.

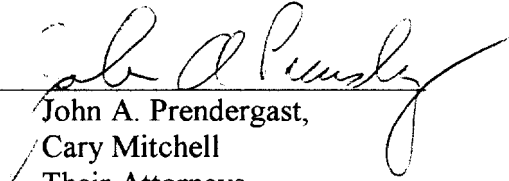
⁵ Comments of BellSouth Corporation (“BellSouth Comments”) at 7-8.

Conclusion

PVT and GWI urge the Commission to refrain from establishing a compliance deadline for wireless carriers until a technical solution from their equipment manufacturer has been fully developed, approved by all standards bodies and field-tested. Likewise, the Commission should not impose any carrier reporting requirements until a digital TTY solution has been developed and tested by their particular infrastructure equipment manufacturer.

Respectfully submitted,
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